

## II. Remarks

### A. Introduction

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1 - 8, 10 - 21, 24 - 29, and 32 - 40 are pending in the application. Claims 1, 10, 11, 16, 24, and 33 are independent. Claims 1, 16, and 24 have been amended to incorporate the features of claims 9, 22, and 30, respectively. Accordingly, claims 9, 22, and 30 have been cancelled. Support for the amendments to claims 10 and 33 may be found at, e.g., at paragraph [0074] of the Application as published. No new matter has been introduced by way of these amendments.

### B. Examiner Interview

The undersigned and the Applicants would like to thank Examiner Heitbrink for the cordial and productive interview of April 13, 2007. The Examiner's helpful comments and suggestions were instrumental in preparing this response.

### C. Drawings

On page 2 of the Office Action, the Patent Office has objected to Figure 4. This objection has been rendered moot in light of the amendments to Figure 4. Specifically, Applicants have amended Figure 4 to include a legend designating Figure 4 as "Prior Art," pursuant to the Examiner's kind suggestion. Reconsideration and withdrawal

of the objection are respectfully requested.

D.        The rejections under 35 U.S.C. § 102(b) should be withdrawn

Claims 10 - 15 and 24 - 32 stand rejected as allegedly being anticipated under 35 U.S.C. § 102(b) by U.S. Patent No. 5,013,231 to Fujita *et al.* (hereinafter "Fujita I"). Applicants respectfully traverse this art rejection.

Independent claim 10 recites that "the rotational speed of the screw is always above zero revolutions per minute" and claim 11 recites a "continuously rotating feedscrew." Similarly, independent claim 24 recites a computer executed procedure for rotating a reciprocating screw "at a speed above zero revolutions per minute for the entire injection molding cycle." In contrast, the feedscrew described in Fujita I stops at one or more points during an injection molding cycle. See, e.g., col. 2, lines 55 - 58 ("Furthermore, the rotation of the screw is **stopped** when the oil pressure in the injection cylinder becomes a predetermined value or when the resin pressure in the mold cavity becomes a predetermined value." (Emphasis added)); col. 6, lines 26 - 30 in reference to FIG. 5 ("At and after time  $t_2$  the rotation of the screw is **stopped** and a relatively low injection speed is resumed and continued until time  $t_3$  determined by the quantity of the resin to be filled during the pressure holding step." (Emphasis added)); and FIG. 2. Further, even the Examiner recognizes, in paragraph 4 of the

Office Action, that "Fujita [I] discloses a program control means for controlling the rotation of the screw and the backpressure during axial movement including the rotational speed of the screw ***being above zero for a substantial period*** of the operation, see abstract and claim 1 in columns 7 and 8." (Emphasis added). The Examiner thereby implicitly acknowledges that the rotational speed of the screw is not always above zero.

Because Fujita I discloses that the rotation of the screw is stopped, Fujita I fails to disclose a screw having a rotational speed that is always above zero as recited in independent claims 10, 11, and 24. Accordingly, Fujita I does not anticipate claims 10, 11, or 24. For the same reasons, Fujita I does not anticipate claims 12 - 15, which depend from claim 11, and 25 - 32, which depend from claim 24. Reconsideration and withdrawal of the rejection are respectfully requested.

E. The rejections under 35 U.S.C. § 103(a) should be withdrawn

Claims 24 - 32 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentably obvious over Fujita I for the reasons set forth in paragraph 6 of the Office Action. Claims 1 - 9, 16 - 23, and 33 - 40 also stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentably obvious over Fujita I in combination with U.S. Patent No. 4,256,678 to Fujita et al. (hereinafter "Fujita II") for the reasons

discussed in paragraph 8 of the Office Action. In sum, claims 1 - 9 and 16 - 40 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentably obvious over Fujita I, alone or in combination with Fujita II. Applicants respectfully traverse these art rejections. Applicants also offer that the rejection of claims 9, 22, 23, 30, and 31 has been rendered moot in view of the cancellation of those claims.

As discussed above in Section D, Fujita I does not teach a feedscrew that rotates at all times during an injection molding cycle. And, even Fujita I, in combination with Fujita II, does not teach such a feedscrew. Accordingly, Fujita I, alone or in combination with Fujita II, does not teach or suggest all the claim limitations of independent claims 1, 16, 24, and 33. For the same reasons, Fujita I, alone or in combination with Fujita II, does not anticipate the claims that depend from claims 1, 16, 24, and 33. Claims 1 - 9, and 16 - 40 are thus not unpatentably obvious over Fujita I, alone or in combination with Fujita II. Reconsideration and withdrawal of the rejections are respectfully requested.

In view of the above, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 625-3620. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Ricardo J. Moran/  
Attorney for Applicants  
Ricardo J. Moran  
Registration No. 48,735

PATENT ADMINISTRATOR  
KATTEN MUCHIN ROSENMAN LLP  
1025 Thomas Jefferson Street, N.W.  
East Lobby, Suite 700  
Washington, D.C. 20007-5201